

## REMARKS

Applicants respectfully request entry of the amendments to claim 1 as set forth herein to place the present application in condition for allowance or in better condition for purposes of appeal. No new matter has been added to the application by virtue of the present amendment. Applicants respectfully request that claim 1 be amended to include the limitation of canceled claim 15. Thus, Applicants believe the present amendment does not raise new issues requiring further search by the Examiner.

Claims 1-14 are pending in the subject application, and all of such claims stand rejected. It is respectfully requested that the pending claims be reconsidered and passed to issuance in view of this response.

## Claim Rejections -- 35 U.S.C. 103 (a)

The Examiner rejected claims 1-3, 5-8 and 10-15 under 35 U.S.C. 103(a) as being unpatentable over Egawa (U.S. Patent No. 5,668,406) in view of Hundt (U.S. Patent No. 5,283,717); rejected claim 4 under 35 U.S.C. 103(a) as being unpatentable over Egawa and Hundt as applied to claims 1-3, and further in view of Hirasawa et al. (U.S. Patent No. 6, 340,839); and, rejected claim 9 under 35 U.S.C. 103(a) as being unpatentable over Egawa and Hundt as applied to claim 1, and further in view of Hernandez et al. (U.S. Patent No. 4,734,818).

Applicants respectfully request that claim 1 be amended to include the limitation of claim 15, and that claim 15 be canceled. Claims 2-14 are dependent upon claim 1, as amended.

As the Examiner states, a difference between Egawa and the present invention is the encapsulating material encapsulating the ground plane. Egawa does not teach or suggest encapsulating the ground plane. The Examiner states that it would have been obvious to modify Egawa by using the encapsulating material to encapsulate the ground plane as taught by Hundt. Applicants respectfully disagree with the Examiner's position. Egawa expressly states that the semiconductor device package shown in FIG. 2(A) includes a wiring substrate 100 "... to provide a lead-less device" (column 3, line 29). Ground plane 18 (including portions 17A and 17) surrounds wiring substrate 100. Thus, encapsulating the ground plane 18 as the Examiner suggests would prevent electrical connections from wiring substrate 100 to a mother board (not shown) upon which Egawa's semiconductor device package is mounted. Since Egawa expressly teaches a "lead-less device", the combination of Egawa and Hundt as suggested by the Examiner fails to teach or suggest a semiconductor device package which has a ground plane encapsulated within the package and a means for making an electrical connection out of the package (i.e. to a mother board upon which the package is mounted).

Thus, the combination of Egawa with Hundt does not teach or suggest Applicants' claims 1-3, 5-8 and 10-14. For the foregoing reasons, claim 4 is neither taught nor suggested, either

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individually or in combination, by Egawa, Hundt or Hirasawa et al. For the foregoing reasons, claim 9 is neither taught nor suggested, either individually or in combination, by Egawa, Hundt or Hernandez et al.

Therefore, Applicants believe the rejections under 35 U.S.C. 103(a) have been overcome.



In light of the foregoing amendments and remarks, all of the claims now presented are believed to be in condition for allowance, and Applicants respectfully request that the outstanding rejections be withdrawn and this application be passed to issue at an early date.

The Examiner is urged to call the undersigned at the number listed below if, in the Examiner's opinion, such a phone conference would aid in furthering the prosecution of this application. No fee is due by virtue of this amendment. However, if the PTO determines that a fee is required, please charge Applicants' Deposit Account, 09-0456. If any extensions or fees are not accounted for, such extension is requested and the associated fee should be charged to our deposit account.

Respectfully Submitted,

For: Fujio et al.

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